

JAP:JRL

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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(T. 18, U.S.C. § 1546)

MOHAMMAD OMAR,

Defendant.

- - - - - X

EASTERN DISTRICT OF NEW YORK, SS:

SEAN FAGAN, being duly sworn, deposes and says that he is a Special Agent with the United States Department of State ("DOS"), duly appointed according to law and acting as such.

Upon information and belief, on or about July 6, 2012, within the Eastern District of New York, the defendant MOHAMMAD OMAR did knowingly and willfully use and attempt to use a United States visa that was procured by means of a false claim or statement and otherwise procured by fraud and unlawfully obtained.

(Title 18, United States Code, Section 1546)

The source of your deponent's information and the grounds for his belief are as follows:<sup>1</sup>

<sup>1</sup> Because the purpose of this affidavit is to set forth only those facts necessary to establish probable cause, I have not set forth all the facts and circumstances of which I am aware.

1. My information comes from a joint investigation of the DOS and the United States Customs and Border Protection ("CBP"). I have spoken with CBP agents, interviewed the defendant and reviewed documents.

2. On July 6, 2012, at approximately 6:01 p.m., the defendant MOHAMMAD OMAR arrived at John F. Kennedy International Airport on Kuwait Airways Flight No. 117 from Kuwait City, Kuwait. The defendant originally departed from Islamabad, Pakistan. The defendant presented Pakistani passport #AE2225322 in the name of "Mohammad Omar," to a CBP officer. The defendant's passport contained a B1/B2 visa, visa control #2012066494003, issued by the United States Bureau of Consular Affairs on May 24, 2012.

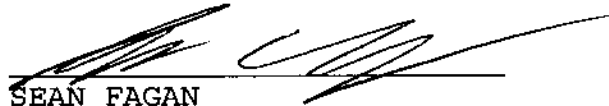
3. The defendant MOHAMMAD OMAR was referred for a secondary inspection by CBP officers, who questioned the defendant about his visa.

4. During the secondary inspection, the defendant MOHAMMAD OMAR stated that he solicited the help of an individual in Pakistan to obtain false employment and bank documents. The defendant's visa application was submitted to the United States embassy in Islamabad, Pakistan.


5. The undersigned DOS Special Agent was called in to conduct an interview. The undersigned DOS Special Agent began to advise the defendant of his Miranda rights. The defendant asked whether there was a case against him, because if so, he would like to speak to an attorney. The undersigned DOS Special Agent advised that it was not the agent's decision as to whether a case would be initiated, and that he was attempting to understand what occurred. The defendant then agreed to answer questions, if there is not a case. The Urdu interpreter then read the defendant his Miranda rights. The defendant signed the Miranda waiver.

6. During the interview, the defendant admitted to the undersigned DOS Special Agent that the employer information listed on his visa application was false. He also stated to the undersigned DOS Special Agent that the people he paid for the fraudulent documents prepared his visa application. The defendant's visa application indicates that the defendant himself prepared the application without assistance. The defendant also admitted that during a visa interview at the United States embassy in Islamabad, he provided false information about bank accounts.

WHEREFORE, your deponent respectfully requests  
that MOHAMMAD OMAR be dealt with according to law.

  
SEAN FAGAN  
Special Agent  
United States Department of State

Sworn to before me this  
7th day of July 2012

  
JOAN M.  
United States  
Eastern District of Virginia  
S/Azvack  
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